

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

JEANNE GRAHAM,)
Plaintiff,)
v.)
WAL-MART STORES EAST I, LP, d/b/a)
WAL-MART #560,)
Defendant.)
Case No. 5:20-cv-06072

JOINT MOTION FOR EXTENSION OF TIME TO CONDUCT DISCOVERY

Defendant Wal-Mart Stores East I, LP (“Walmart”) and Plaintiff Jeanne Graham move this Court for an Order extending time for all discovery deadlines for a period of thirty days. In support of this Motion, the Parties state as follows:

1. The undersigned counsel have conferred and believe a brief extension of discovery deadlines is merited in this matter.
2. This is the Parties' first request for an extension of this deadline.
3. The deadline to complete discovery is currently December 31, 2020.
4. The Parties request a thirty-day extension for all currently pending discovery deadlines.
5. The Parties have diligently proceeded with discovery in this matter, however, the proposed extension is necessary because: 1) the depositions of Plaintiff and Plaintiff's designated medical expert were postponed because of unforeseen circumstances related to COVID-19, including a 14 day quarantine order issued by the St. Joseph Health Department; and 2) therefore, Defendant needs additional time to designate its experts.
6. The Deposition of Plaintiff's expert has been rescheduled for November 23, 2020 at 1:00 p.m.

7. The Parties' requested amendments to the Scheduling Order impact only future deadlines that have not yet passed. *See Fed. R. Civ. P. 6(b) (1)(A)* ("the court may, for good cause, extend the time: with or without motion . . . or if a request is made, before the original time or its extension expires[.]").

8. The Parties propose the following amendment to the discovery plan and scheduling deadlines:

Discovery Event	Current Deadline	Proposed Deadline
Defendant's Expert Designation	11/30/20	12/30/20
Rebuttal Expert Designations	12/17/20	1/18/21
Discovery Dispute Motions	12/17/20	1/18/21
Completion of Discovery	12/31/20	02/01/21
Dispositive Motions	02/01/21	03/03/21

9. This matter is set for trial to begin on June 28, 2021. The trial date is not affected by the Parties' requested amendments to the Scheduling Order.

10. The Parties do not anticipate any prejudice to result from the requested extension.

WHEREFORE, Defendant Walmart and Plaintiff Jeanne Graham respectfully request that this Court grant this Motion and enter an Order extending the time to conduct discovery, and for such other relief as the court deems just and proper.

Respectfully Submitted,

MONTEE LAW FIRM

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ATTORNEYS FOR DEFENDANT
WAL-MART STORES EAST I, LP

CERTIFICATE OF SERVICE

I certify that on this 20th day of November 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court, which will send notification to all counsel of record.

/s/ Gregorio Silva _____